

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	Chapter 11
STRUDEL HOLDINGS LLC and AVR AH LLC,	§	Case No. 23-90757 (CML)
Debtors.¹	§	(Jointly Administered)

**ELEVENTH MONTHLY FEE STATEMENT OF PORTER HEDGES LLP, AS
BANKRUPTCY COUNSEL FOR THE DEBTORS AND DEBTORS-IN-POSSESSION, FOR
ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR THE
PERIOD FROM JUNE 1, 2024 THROUGH JUNE 30, 2024**

Name of Applicant:	Porter Hedges LLP, as Bankruptcy Counsel for the Debtors and Debtors-In-Possession
Date of Retention Order:	September 27, 2023 (Doc. No. 164)
Period for which Fees and Expenses are Incurred:	June 1, 2024 through and including June 30, 2024
Interim Fees Incurred:	\$27,148.50
Interim Payment of Fees Requested (80%):	\$21,718.80
Interim Expenses Incurred:	\$42.60
Total Fees and Expenses Due:	\$21,761.40

This is the Eleventh Monthly Fee Statement.

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: AVR AH LLC (0148) and Strudel Holdings LLC (5426). The Debtors' service address is: PO Box 4068, Aspen, CO 91612.

Porter Hedges LLP (“Porter Hedges”), as Bankruptcy Counsel for the Debtors and Debtors-In-Possession (the “Debtors’ Counsel”) submits this Eleventh Monthly Fee Statement (the “Fee Statement”) for the period from June 1, 2024 through June 30, 2024 (the “Application Period”) in accordance with the Order Granting Debtors’ Motion for an Order Under 11 U.S.C. §§ 105(A) and 331 Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals [Docket No. 142] (the “Interim Compensation Order”).

Porter Hedges requests compensation for professional services rendered in the amount of \$27,148.50 (the “Fees”), and for reimbursement of out-of-pocket expenses incurred in the amount of \$42.60 (the “Expenses”), for the period from June 1, 2024 through June 30, 2024. Eighty percent (80%) of the fees equals \$21,718.80 and one hundred percent (100%) of the Expenses equals \$42.60 for a total requested amount of \$21,761.40.

Summaries of the calculations for these fees by project category and expenses are attached hereto as Exhibit 1 and Exhibit 2, respectively. A summary of the time expended by Porter Hedges attorneys and support staff, together with their respective hourly rates, is attached hereto as Exhibit 3. Porter Hedges’ invoices for the Application Period is attached hereto as Exhibit 4.

WHEREFORE, Porter Hedges respectfully requests payment and reimbursement in accordance with the procedures set forth in the Interim Compensation Order (*i.e.*, payment of eighty percent (80%) of the compensation sought, in the amount of \$21,718.80 and reimbursement of one hundred percent (100%) of expenses incurred in the amount of \$42.60 in the total amount of \$21,761.40.

Dated: July 15, 2024.
Houston, Texas

PORTER HEDGES LLP

By: /s/ Joshua W. Wolfshohl
Joshua W. Wolfshohl (TX Bar No. 24038592)
Aaron J. Power (TX Bar No. 24058058)
Michael B. Dearman (TX Bar No. 24116270)
1000 Main St., 36th Floor
Houston, TX 77002
Tel: (713) 226-6000
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jwolfshohl@porterhedges.com
apower@porterhedges.com
mdearman@porterhedges.com

**COUNSEL FOR DEBTORS
AND DEBTORS IN POSSESSION**

CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document was forwarded by electronic transmission to all registered ECF users appearing in the case on July 15, 2024.

/s/ Joshua W. Wolfshohl
Joshua W. Wolfshohl

EXHIBIT 1**SUMMARY OF TIME EXPENDED BY PROJECT CATEGORY**

Project Category	Total Hours	Total Fees Requested
Case Administration	2.20	1,109.00
Asset Disposition	0.00	0.00
Claims Administration and Objections	0.00	0.00
Asset Analysis/Recovery	7.10	6,068.50
Adversary Proceedings/Litigation	.90	490.50
Business Operations	0.00	0.00
Fee/Employment Applications	5.80	3,126.00
Financing/Cash Collateral	0.00	0.00
Meetings and Communications with Creditors	15.00	13,125.00
Relief from Stay/Adequate Protection	0.00	0.00
Assumption/Rejection of Leases and Contracts	0.00	0.00
Hearings	3.60	2,991.00
Plan and Disclosure Statement	.30	238.50
Reporting	0.00	0.00
TOTAL	34.90	\$27,148.50

EXHIBIT 2

SUMMARY OF OUT-OF-POCKET EXPENSES

Expenses	Cost
Computer Assisted Legal Research	42.60
TOTAL	\$ 42.60

EXHIBIT 3**SUMMARY OF TIME EXPENDED BY ATTORNEYS AND SUPPORT STAFF**

Professional	Hourly Rate	Total Hours
Joshua W. Wolfshohl	\$875.00	23.60
Aaron J. Power	\$795.00	5.00
Michael B. Dearman	\$565.00	1.50
Carey A. Sakert	\$445.00	.20
Eliana Garfias	\$345.00	4.60
TOTAL		34.90

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Date 07/15/24
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JOSHUA W. WOLFSHOHL

AVR AH LLC AND STRUDEL HOLDINGS LLC
CORPORATE RECOVERY SERVICES
ATTN: DOUG BRICKLEY

TAX ID# 74-2174193

Case Administration

Invoice Summary

Professional Services	\$1,109.00
Disbursements	42.60
Total Current Invoice	\$1,151.60
TOTAL AMOUNT DUE	\$1,151.60
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	JOSHUA W. WOLFSHOHL

TAX ID# 74-2174193

For professional services rendered and related expenses incurred in the above-referenced matter through June 2024, as follows:

Date	Tkpr	Description	Hours	Amount
06/21/24	MBD	Review correspondence from J. Wolfshohl and A. Power regarding secured parties' letter (.1); draft motion and order for status conference (1.1); multiple correspondence with J. Wolfshohl and A. Power regarding secured parties letter and motion (.3).	1.50	847.50
06/23/24	EG	Continued correspondence on filing of emergency motion (.1); finalize and electronically file same with court (.2); download and circulate filed version (.1); email case manager on submission of same (.1).	0.50	172.50
06/27/24	CAS	Create FTP link for Y. McCullar to forward documents to client.	0.20	89.00
Total Services			2.20	\$1,109.00

Timekeeper Summary

Attorney/Legal Assistant	Title	Hours	Rate	Amount
MBD Michael B. Dearman	Associate	1.50	565.00	847.50
CAS Carey A. Sakert	Paralegal	0.20	445.00	89.00
EG Eliana Garfias	Paralegal	0.50	345.00	172.50

Disbursements Summary

Description	Value
Computer Assisted Legal Research	42.60
Total Disbursements	\$42.60

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Invoice Total	\$1,151.60
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Date 07/15/24
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JOSHUA W. WOLFSHOHL

AVR AH LLC AND STRUDEL HOLDINGS LLC
CORPORATE RECOVERY SERVICES
ATTN: DOUG BRICKLEY

TAX ID# 74-2174193

Asset Analysis/Recovery

Invoice Summary

Professional Services	\$6,068.50
Disbursements	0.00
<hr/>	<hr/>
Total Current Invoice	\$6,068.50
TOTAL AMOUNT DUE	\$6,068.50

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	JOSHUA W. WOLFSHOHL

TAX ID# 74-2174193

For professional services rendered and related expenses incurred in the above-referenced matter through June 2024, as follows:

Date	Tkpr	Description	Hours	Amount
06/13/24	AJP	Discussions with J. Wolfshohl regarding potential sale and compromise with O'Connor parties.	0.60	477.00
06/26/24	JWW	Conference with D. Brickley regarding case status and Ajax transaction (.3); meet with Soukis regarding same (1.5); conference with L. Metzger regarding hearing and follow-up emails regarding same (.9).	2.70	2,362.50
06/27/24	AJP	Telephonically attend status conference regarding sale of non-debtor assets.	1.00	795.00
06/28/24	AJP	Discuss outcome of hearing with J. Wolfshohl and potential next steps.	0.20	159.00
06/28/24	JWW	Phone conference with L. Metzger regarding Ajax sale issues (.2); phone conference with A. Power regarding same (.2); draft outline of sale structure (.5); conference with A. Power and review comments to same (.4).	1.30	1,137.50
06/29/24	JWW	Work on sale structure and emails regarding same (.4); conference with D. Brickley regarding same (.1); conference with L. Metzger regarding same (.4); review local rules regarding stay relief and emails with A. Power regarding same (.4).	1.30	1,137.50
Total Services			7.10	\$6,068.50

Timekeeper Summary

Attorney/Legal Assistant		Title	Hours	Rate	Amount
AJP	Aaron J. Power	Partner	1.80	795.00	1,431.00
JWW	Joshua W. Wolfshohl	Partner	5.30	875.00	4,637.50

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TAX ID# 74-2174193

Total Disbursements	\$0.00
Invoice Total	\$6,068.50

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	JOSHUA W. WOLFSHOHL

AVR AH LLC AND STRUDEL HOLDINGS LLC
CORPORATE RECOVERY SERVICES
ATTN: DOUG BRICKLEY

TAX ID# 74-2174193

Fee/Employment Applications

Invoice Summary

Professional Services	\$3,126.00
Disbursements	0.00
	<hr/>
Total Current Invoice	\$3,126.00
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TOTAL AMOUNT DUE	\$3,126.00
	<u><u>\$3,126.00</u></u>

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	JOSHUA W. WOLFSHOHL

TAX ID# 74-2174193

For professional services rendered and related expenses incurred in the above-referenced matter through June 2024, as follows:

Date	Tkpr	Description	Hours	Amount
06/05/24	EG	Continue organizing PH's invoices and drafting fee application.	2.30	793.50
06/06/24	EG	Finalize fee application.	0.80	276.00
06/07/24	EG	Emails on notice of PH's Tenth monthly fee statement (.1); coordinate service of same (.1).	0.20	69.00
06/20/24	AJP	Review and revise draft motion [REDACTED].	1.40	1,113.00
06/21/24	AJP	Calls with J. Wolfshohl regarding [REDACTED] [REDACTED] (.5); review secured lenders' letter to the Court regarding sale of real property and respond with comments to J. Wolfshohl (.3); email M. Dearman regarding request for emergency status conference (.1); revise draft motion for emergency status conference and attention to related emails (.2).	1.10	874.50
Total Services			5.80	\$3,126.00

Timekeeper Summary

Attorney/Legal Assistant	Title	Hours	Rate	Amount
AJP Aaron J. Power	Partner	2.50	795.00	1,987.50
EG Eliana Garfias	Paralegal	3.30	345.00	1,138.50
Total Disbursements				\$0.00

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JOSHUA W. WOLFSHOHL

TAX ID# 74-2174193

Invoice Total \$3,126.00

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	JOSHUA W. WOLFSHOHL

AVR AH LLC AND STRUDEL HOLDINGS LLC
CORPORATE RECOVERY SERVICES
ATTN: DOUG BRICKLEY

TAX ID# 74-2174193

Adversary Proceedings/Litigation

Invoice Summary

Professional Services	\$490.50
Disbursements	0.00
Total Current Invoice	\$490.50
TOTAL AMOUNT DUE	\$490.50

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TAX ID# 74-2174193

For professional services rendered and related expenses incurred in the above-referenced matter through June 2024, as follows:

Date	Tkpr	Description	Hours	Amount
06/05/24	EG	Correspondence on notice of termination of mediation (.1); finalize and electronically file same with court (.3); organize file (.1).	0.50	172.50
06/05/24	AJP	Discuss outcome of mediation and potential next steps with J. Wolfshohl.	0.30	238.50
06/27/24	AJP	Review draft of objection to motion for entry of judgment and email comments to J. Wolfshohl.	0.10	79.50
Total Services			0.90	\$490.50

Timekeeper Summary

Attorney/Legal Assistant		Title	Hours	Rate	Amount
AJP	Aaron J. Power	Partner	0.40	795.00	318.00
EG	Eliana Garfias	Paralegal	0.50	345.00	172.50
Total Disbursements					\$0.00
Invoice Total					\$490.50

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AVR AH LLC AND STRUDEL HOLDINGS LLC
CORPORATE RECOVERY SERVICES
ATTN: DOUG BRICKLEY

TAX ID# 74-2174193

Meetings and Communications with Creditors

Invoice Summary

Professional Services	\$13,125.00
Disbursements	0.00
Total Current Invoice	\$13,125.00
TOTAL AMOUNT DUE	<u>\$13,125.00</u>

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TAX ID# 74-2174193

For professional services rendered and related expenses incurred in the above-referenced matter through June 2024, as follows:

Date	Tkpr	Description	Hours	Amount
06/03/24	JWW	Review power point slides from O'Conner and emails with D. Brickley and A. Power regarding mediation (.5); conference with T. Davidson regarding same (.5).	1.00	875.00
06/04/24	JWW	Attend mediation (5.0); meet with L. Metzger regarding case strategy (.5); conference with T. Davidson regarding next steps (.2).	5.70	4,987.50
06/05/24	JWW	Phone conference with M. Warner regarding resolution of HOA claims (.4); conferences with D. Brickley regarding next steps in case (.6); conference with L. Metzger regarding same (.3); draft notice of mediation termination for filing (.1).	1.40	1,225.00
06/11/24	JWW	Emails with L. Metzger regarding open issues in case (.3); conference with M. Warner regarding HOA resolution and related issues (.4).	0.70	612.50
06/12/24	JWW	Conference with L. Metzger regarding next steps in case.	0.50	437.50
06/13/24	JWW	Meet with A. Power regarding potential sale and resolution of cases (.5); conference with L. Metzger regarding same (.7); further conference with A. Power (.2).	1.40	1,225.00
06/14/24	JWW	Conference with T. Davidson regarding next steps in case (.3); conference with L. Metzger regarding same (.6).	0.90	787.50
06/19/24	JWW	Emails regarding proposed stipulation.	0.20	175.00
06/20/24	JWW	Phone conferences with L. Metzger and review and revise pleading for filing with court.	0.80	700.00

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Date	Tkpr	Description	Hours	Amount
06/21/24	JWW	Phone conference with D. Brickley regarding Ajax sale (.3); emails with L. Metzger regarding same (.2); conference call regarding same (.6); further calls and emails with D. Brickley (.4); review letter from UBS parties and forward same to D. Brickley and A. Power and conference regarding same (.5).	2.00	1,750.00
06/25/24	JWW	Review docket and emails with L. Metzger regarding hearing (.2); emails with counsel for Soukis regarding meeting to discuss Ajax and status hearing (.2).	0.40	350.00
Total Services			15.00	\$13,125.00

Timekeeper Summary

<u>Attorney/Legal Assistant</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
JWW Joshua W. Wolfshohl	Partner	15.00	875.00	13,125.00
Total Disbursements				\$0.00
Invoice Total				\$13,125.00

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AVR AH LLC AND STRUDEL HOLDINGS LLC
CORPORATE RECOVERY SERVICES
ATTN: DOUG BRICKLEY

TAX ID# 74-2174193

Plan and Disclosure Statement

Invoice Summary

Professional Services	\$238.50
Disbursements	0.00
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Total Current Invoice	\$238.50
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TOTAL AMOUNT DUE	\$238.50
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	JOSHUA W. WOLFSHOHL

TAX ID# 74-2174193

For professional services rendered and related expenses incurred in the above-referenced matter through June 2024, as follows:

Date	Tkpr	Description	Hours	Amount
06/28/24	AJP	Review and revise proposal to lenders on plan structure and discuss with J. Wolfshohl.	0.30	238.50
Total Services			0.30	\$238.50

Timekeeper Summary

Attorney/Legal Assistant	Title	Hours	Rate	Amount
AJP Aaron J. Power	Partner	0.30	795.00	238.50
Total Disbursements			\$0.00	
Invoice Total			\$238.50	

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AVR AH LLC AND STRUDEL HOLDINGS LLC
CORPORATE RECOVERY SERVICES
ATTN: DOUG BRICKLEY

TAX ID# 74-2174193

Hearings

Invoice Summary

Professional Services	\$2,991.00
Disbursements	0.00
Total Current Invoice	\$2,991.00

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	JOSHUA W. WOLFSHOHL

TAX ID# 74-2174193

For professional services rendered and related expenses incurred in the above-referenced matter through June 2024, as follows:

Date	Tkpr	Description	Hours	Amount
06/21/24	EG	Correspondence on filing logistics of emergency motion requesting status conference.	0.10	34.50
06/22/24	EG	Further emails on filing logistics of emergency motion for status conference.	0.20	69.00
06/27/24	JWW	Prepare for hearing (.5); attend hearing and meet with L. Metzger and D. Brickley after hearing (2.4); emails with L. Metzger regarding same (.4).	3.30	2,887.50
Total Services			3.60	\$2,991.00

Timekeeper Summary

Attorney/Legal Assistant	Title	Hours	Rate	Amount
JWW Joshua W. Wolfshohl	Partner	3.30	875.00	2,887.50
EG Eliana Garfias	Paralegal	0.30	345.00	103.50
Total Disbursements				\$0.00
Invoice Total				\$2,991.00